

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ALI RAZAK, KENAN SABANI and,  
KHALDOUN CHERDOUD, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC. and  
GEGEN LLC,

Defendants.

Case No. 16-0573

Judge Michael M. Baylson

**APPENDIX TO DEFENDANTS'  
STATEMENT OF UNDISPUTED MATERIAL FACTS  
IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

The following is an appendix of documents in support of Defendants' Statement of Undisputed Material Facts in Support of its Motion for Summary Judgment.

Exhibit	
1	Excerpts from the Deposition of Umer Razak as Corporate Representative of Luxe Limousine Services, Inc. – FILED UNDER SEAL PURSUANT TO PLAINTIFFS' REQUEST
2	Excerpts from the Deposition of Kenan Sabani (January 4, 2018) – FILED UNDER SEAL PURSUANT TO PLAINTIFFS' REQUEST
3	Excerpts from the Deposition of Kenan Sabani (May 8, 2017)
4	Excerpts from the Deposition of Ali Razak (May 8, 2017)
5	Excerpts from the Deposition of Ali Razak (January 3, 2018) – FILED UNDER SEAL PURSUANT TO PLAINTIFFS' REQUEST
6	Excerpts from the Deposition of Jordan Holtzman-Conston
7	Excerpts for the Deposition of Khaldoun Cherdoud – FILED UNDER SEAL PURSUANT TO PLAINTIFFS' REQUEST
8	Declaration of Jordan Holtzman-Conston
9	Luxe Limousine Pennsylvania Articles of Incorporation
10	Luxe's PUC Certificate
11	Technology Services Agreement dated December 11, 2015
12	Driver Addendum

13	Luxe 2015 U.S. Income Corporate Tax Return – FILED UNDER SEAL PURSUANT TO PLAINTIFFS’ REQUEST
14	Luxe 2016 U.S. Corporate Income Tax Return – FILED UNDER SEAL PURSUANT TO PLAINTIFFS’ REQUEST
15	Luxe list of 1099 transportation providers
16	Razak 2016 U.S. Individual Income Tax Return – FILED UNDER SEAL PURSUANT TO PLAINTIFFS’ REQUEST
17	Printout of Luxe website
18	Razak 2015 U.S. Individual Income Tax Return – FILED UNDER SEAL PURSUANT TO PLAINTIFFS’ REQUEST
19	Barry Limo, LLC Partnership Agreement
20	Invoice of Luxe’s Blacklane trips
21	Sabani correspondence with private customers
22	Sabani 2014 U.S. Individual Income Tax Return – FILED UNDER SEAL PURSUANT TO PLAINTIFFS’ REQUEST
23	Sabani 2015 U.S. Individual Income Tax Return – FILED UNDER SEAL PURSUANT TO PLAINTIFFS’ REQUEST
24	Sabani 2016 U.S. Individual Income Tax Return – FILED UNDER SEAL PURSUANT TO PLAINTIFFS’ REQUEST
25	Cherdoud 2013 U.S. Individual Income Tax Return – FILED UNDER SEAL PURSUANT TO PLAINTIFFS’ REQUEST
26	Printout of Freemo’s website
27	Printout of Freemo’s Yelp advertisement
28	Articles of Incorporation for Milano Limo, Inc.
29	Transcript of Hearing (Oct. 18, 2017)
30	Freemo’s Sales Report generated from Square payment processing tool
31	IRS Form 1099s Luxe issued to its drivers in 2016 – FILED UNDER SEAL PURSUANT TO PLAINTIFFS’ REQUEST

Respectfully submitted,

Dated: January 26, 2017

/s/ Joshua C. Vaughn

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**CERTIFICATE OF SERVICE**

I, Joshua C. Vaughn, hereby certify that on this January 26, 2018, I caused the foregoing APPENDIX TO DEFENDANTS' STATEMENT OF UNDISPUTED MATERIAL FACTS IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT to be filed using the Eastern District of Pennsylvania's ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon the following counsel of record:

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